

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MARY YOUNG,
Plaintiff,

v.

TEXAS SOUTHERN UNIVERSITY,
Defendant.

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Civil Action No. 4:23-cv-03888

DECLARATION OF BOBBY BROWN

I, Bobby Brown, have personal knowledge or knowledge based on my review of business records of Texas Southern University ("TSU"), of all statements below. I hereby make the following declaration under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. My name is Bobby Brown. I am at least 18 years old, of sound mind, and competent to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.

2. I am the Chief of Police at TSU.

3. On December 2, 2022, I was invited to a meeting with Human Resources, TSU's General Counsel, Hao Le, Devi Bala and Ms. Yolonda Edmond, the Human Resources Director. I was asked to serve as Acting Chief of Police at TSU. From this date until the date Mary Young was officially terminated from employment at TSU in January 2023 was the worst time period of my career. I was selected to serve as Acting Chief of Police because I was the highest-ranking sergeant with the academic credentials to serve as chief. I have a bachelor's degree and master's degree, master peace officer certification and I have the FBI LEEDA Trilogy Award which covers three areas Supervisor Leadership Institute, Command Leader Institute, Executive Leader Institute. This award is recognized by the Texas Commission On Law Enforcement "TCOLE" as a requirement to serve as a police Chief.

4. Mary Young did not comply with the terms of her investigative leave, requiring her to remain off campus. She instead deliberately resisted this directive and continued to come to campus and attempt to act as Police Chief despite the fact that I had been appointed as acting Chief of Police.

5. During this time period, Mary Young personally attacked me and my family. I was approached by a couple of people who want to remain anonymous due to fear of retaliation from Mary Young. I was told that Ms. Mary Young's attorney wanted to have a meeting with me outside

of TSU. He wanted me to give a statement that I saw inappropriate things going on with the then President Crumpton-Young. If I would do this, he would ensure that I would come out of this on top. When I refused to be a part of this, I was told that they were going to bring forth information about me sleeping around or attempting to sleep with a subordinate while I was a sergeant.

6. On or around December 8, 2025, I became aware that Mary Young and her attorney approached multiple police officers on campus on December, 8, 2025, and were handing them court documents, telling them that Mary Young is still the chief, not me. Mary Young's actions during this time period created an intense split in the department. Approximately half of the officers sided with Mary Young. While Mary Young was on leave, she continued to come into the office causing confusion within the staff. Each time I gave an officer a directive, it was overruled by Mary Young. For example, in December 2022, TSU was preparing to have our Board of Regents meeting. I was contacted by the TSU Regent's office to have someone pick-up one of the Regents from Hobby Airport. I sent one officer to pick up this Regent. Mary Young ordered this officer over the police radio to return back to campus because she didn't give the direct order. She stated she was still the chief, not Sgt. Brown. She then sent a different officer to complete this pick-up, leaving the Regent to sit and wait.

7. Another incident occurred when I requested a copy of overtime pay from Mrs. Scruggs on December 8, 2022, who sent the request to Mary Young. Mary Young responded "I'm sure Sergeant Brown understands that this is a clear violation of the law and privacy, I can't imagine why he would want to know this privileged information? Ultimately, I was refused the information that was requested by me in order to complete a budget inquiry by CFO Bala.

8. In addition, before each TSU graduation ceremony, TSU officers have a meeting that morning. However, due to this conflict with Mary Young, I was not able to have one. Mary Young forced the officers to go to a meeting with her.

9. Mary Young has alleged that she was treated differently because she is a woman. I have no knowledge of any way in which Mary Young was treated differently than male officers because she is a woman.

10. I am unaware of any TSU officer in possession of the knowledge or belief that President Crumpton-Young accepted Mary Young's policing recommendations or ideas only if they were endorsed, agreed to, sponsored, or suggested by a male police officer. And I have no knowledge or belief that President Crumpton-Young acted in this way.

11. Further, I am unaware of any TSU officer realizing or believing that they were more influential and productive than Mary Young with President Crumpton Young just because they were male. And I have never had this belief.

12. I have never heard President Crumpton-Young say anything indicating that she favored male police officers over female officers. I am unaware of President Crumpton-Young requiring Mary Young to advise her whether her policing recommendations were agreed to, endorsed, or approved by a male officer. I am unaware of Mary Young ignoring or rejecting Mary Young's policing recommendations unless they were agreed to, endorsed by, or approved by a male officer. I am unaware of President Crumpton-Young calling male police officers outside of TSU for policing advice or recommendations.

13. Before I assumed the role of Acting Chief of Police, I previously served as a member of the TSU President's security detail. Mary Young assigns the officers who serve on the President's security detail. Mary Young informed us, when President Crumpton-Young first arrived at the university in 2021 as a new President of the university, that we were to make Crumpton-Young know how important the police department is. Mary Young instructed us to do whatever we can do to make the President happy. The officers, myself included, interpreted this direction to mean that we were to do whatever the President asked us to do. In other words, if the President asked us to hold something, carry her purse, or drive her to an appointment or errand, we were to comply with the President's requests.

14. On or around April 15, 2022, Mary Young informed all of the officers on President Crumpton-Young's security detail that we were to stop assisting the President by carrying her bags, purse etc. Mary Young told us that if the President made any personal requests, we were to direct them to Mary Young. Mary Young stated that our job is to protect the President only, and not to carry her bags or purses. Mary Young also told us not to hold her dress if she is walking, and that is what she has an assistant for. It was strongly encouraged that we will direct everything to Mary Young.

15. The TSU President resides in the President's House, which is located approximately 1.5 miles from campus. The members of TSU's security detail do not guard the house, but each shift perform 1-2 "drivebys" to check on the President. This includes shifts at night. The officers drive to the house, turn their patrol lights on, and sit at the end of the drive so the President can see the officers. The officers would leave their patrol vehicle to check on the President if the President asked. Typically, the President will call TSU's dispatcher if he or she needs assistance.

16. I did not participate in the decision to place Mary Young on administrative leave, investigate any complaint that was filed against Mary Young, or terminate Mary Young's employment.

17. Once Mary Young was terminated, it took approximately 1.5 years for me to get this department to move forward. Counseling was offered to the officers. I had to transition the TSU Police Department away from a system where leadership (Mary Young) displayed favoritism.

Several officers were removed from positions of prominence that had previously allowed them not to held accountable. Supervisors have been directed to take true leadership training that they lacked. Several of the officers who Mary Young favored have voluntarily left the department.

My name is Bobby Brown. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Harris County, Texas on April 21, 2025.

Bobby Brown
Bobby Brown, Declarant